

SANTA MONICA MOUNTAINS CONSERVANCY

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Elizabeth Erickson
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street
Los Angeles, California 90013

Santa Clara River Total Maximum Daily Load Standards on Nitrogen Compounds

Dear Ms. Erickson,

The Santa Monica Mountains Conservancy is the principal state agency charged with planning and conservation for the Santa Monica Mountains Zone and the Rim of the Valley Corridor pursuant to Division 23 of the Public Resources Code. The Rim of the Valley Corridor includes the portions of the upper and middle reaches of the Santa Clara River. We offer the following comments on the Santa Clara River Total Maximum Daily Load standards (TMDL) on nitrogen compounds.

Overall, the proposed TMDL standards on nitrogen compounds are thorough and essential to reach the goal of a healthy watershed for the Santa Clara River. The Regional Board's concerns regarding nitrogen impairment are careful and proactive. Although the Santa Clara River was dropped from the 303(d) list in 2002, the TMDL supports State of California recommendations that the river remain on the monitoring list.

As one of only two natural river systems remaining in Southern California, the Santa Clara River is a critical resource for fish and wildlife populations. The river is essential for five federally designated endangered species: southern steelhead trout, unarmored threespine stickleback, arroyo toad, least bell's vireo and southwestern willow flycatcher. Numerous sensitive plants and wildlife also inhabit the river system. The principal threats to water quality in the Santa Clara watershed are stormwater runoff pollution, increasing loads of nitrogen and salt, erosion, and conversion of open space to developed land. Non-point source monitoring is key in reducing agricultural nutrient loading and does warrant further study as recommended.

The TMDL properly acknowledges the importance of groundwater recharge as a beneficial use for the Santa Clara River. Increased population in the area over the next decade will

negatively affect the river's water quality and its potential for groundwater recharge. Population growth will also increase nitrogen loads in the river. The TMDL's water quality objectives address growing concerns regarding ammonia contamination.

The TMDL's inclusion of an implementation plan to monitor aquatic life is a key step in achieving the ecological objectives. Monitoring plants, invertebrates and vertebrates will provide a scientific basis to evaluate the quality of wildlife habitat. Monitoring will also indicate if the system is functioning correctly and if the negative impacts of nitrogen and ammonia on wildlife are decreasing.

The Regional Board is to be applauded for presenting standards that address issues of anti-degradation as set by the EPA. The Conservancy would like the TMDL to acknowledge the value of stream restoration for anti-degradation. The restoration of natural stream processes is a commonly accepted tool used to prevent degradation and restore water quality. Stream restoration techniques including re-vegetation and re-grading to the natural topography result in the restoration of a natural flow regime.

The quality of both surface and ground waters are enhanced by stream restoration. Increased tree cover results in reduced water temperatures, encouraging higher levels of dissolved oxygen and enhancing aquatic habitat. Understory plants remove excess nitrogen from the soil, filter contaminants, and can slow the rate of stormwater flows. Stream restoration projects in the Santa Clara River watershed will result in increased ground water recharge, less runoff to the estuary, and enhanced wildlife habitat.

The Conservancy has an active program to mitigate damages in the watershed should violations of this TMDL occur. Our staff would be happy to meet with Regional Board staff to present our program and review opportunities in the Santa Clara River watershed.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Chuck Arnold of our staff at (323) 221-8900, extension 183.

Sincerely,

JEROME C. DANIEL
Chairperson